

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA)	
)	Case No. 20-MJ-365-2 (HB)
v.)	
)	
BAILEY MARIE BALDUS)	

GOVERNMENT'S AGREED MOTION TO DISMISS

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States Attorney for the District of Minnesota hereby moves the Court to dismiss the pending criminal charge, namely, the Criminal Complaint (Dkt. 7) against defendant Bailey Baldus, without prejudice, in the interests of justice. Fed. R. Crim. P. Rule 48(a) provides that the government may, with leave of court, dismiss an indictment information, or complaint. The undersigned has communicated with defense counsel Daniel Guerrero, who joins this motion.

1. On June 9, 2020, Ms. Baldus was arrested as result of a complaint charging her with conspiracy to commit arson, in violation of Title 18, United States Code, Section 371. She had her initial appearance that day, and was subsequently released on bond.

2. The government is continuing its investigation into this matter, including reviewing material seized pursuant to search warrants and reviewing other evidence to determine the scope of the alleged conduct by Ms. Baldus and others.

3. The parties have continued to confer about Ms. Baldus's alleged conduct, which the government anticipates will result in an appropriate resolution that obviates the need for the current pending charge against Ms. Baldus.

Accordingly, with the defendant's consent and pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the government hereby moves the Court to dismiss the pending charge against defendant Bailey Baldus.

Dated: July 1, 2020

Respectfully submitted,

ERICA H. MacDONALD
United States Attorney

s/Matthew S. Ebert
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JOSEPH S. TEIRAB
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